

## **EXHIBIT 87**

### **Declaration of Atrayus O. Goode**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR  
ADMISSIONS, INC.,**

**Plaintiff,**

**v.**

**UNIVERSITY OF NORTH  
CAROLINA et al.,**

**Defendants.**

**DECLARATION OF ATRAYUS O. GOODE**

## DECLARATION OF ATRAYUS O. GOODE

I, Atrayus O. Goode, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

### **Experience**

1. I am an African-American male and a first generation college student. I am a 2007 graduate of The University of North Carolina at Chapel Hill ("UNC-Chapel Hill"), have a Master of Science degree from American University, and am currently pursuing a Master of Arts degree from Duke Divinity School.
2. I am the President and Chief Executive Officer of Movement of Youth, Inc., ("MOY") a youth development organization for underserved youth. I have served in this position since founding the organization in 2006 as a junior at UNC-Chapel Hill.
3. As the President and Chief Executive Officer of MOY, I am currently working with approximately 1,000 college students across four states to provide youth development services to underserved youths. We provide team mentoring, leadership academy, college and university tours, international delegations, and college scholarships.
4. While at UNC-Chapel Hill, I was inducted into the Order of the Golden Fleece, which is the University's oldest and highest honorary society.
5. I have worked for Public Allies, an AmeriCorps program that advances diverse leaders through paid apprenticeships in nonprofits.

6. I gave a TED talk at Duke University in 2014.

### **Personal Background**

7. I grew up in Clarkston, Georgia living with my mother and father as an only child.

8. I had a rocky childhood. I first noticed my mother was using crack when I was five years old. My dad tried to shield me from it as best he could, but my mother still took me to crack houses and to buy drugs. My mom went to prison and rehab.

9. Police brutality became real for me at a young age. I remember seeing my mom snatched out of the house and slammed onto concrete floors by large police officers.

10. In middle school, we moved to Charlotte, North Carolina.

11. I tried to live a normal life, but I had many problems as a result of my childhood. I was recommended to a mentoring program.

12. I began a mentoring program with 100 Black Men of America. Their motto was “what they see is what they’ll be.” For the first time, I was exposed to seeing people who looked like me in professional settings, including African-American doctors and lawyers.

13. My mentor was an African-American banker. Seeing successful African-American members of society helped me understand that I could be successful

too. This mentorship program expanded my world, helped me to reconcile my past, and supported me in charting a different life course. It made me want to go to college.

### **Giving Back Through Movement Of Youth**

14. My high school guidance counselor recommended that I apply to UNC-Chapel Hill. I was accepted and received a full scholarship from 100 Black Men of America. I felt I was standing on the shoulders of giants, of those who had laid the foundation for me. I immediately felt an overwhelming urge to give back.

15. As a student at UNC-Chapel Hill, I was very involved in campus life. I was involved with the University's Office of Diversity and Multicultural Affairs, became a Project Uplift counselor to introduce high school students of color to UNC-Chapel Hill and college in general, was a resident advisor, worked with the Black Student Movement (a Black affinity group), sang in an acapella group, and pledged a Black fraternity, Alpha Phi Alpha. During my junior year, I started MOY. MOY began because I saw a need to address the educational and social needs of underrepresented populations. I also formed MOY as a way to give back to those who helped me be successful.

16. MOY started as a Black Student Movement service project working with young men of color from Hillside High School in Durham, North Carolina. At the time, Hillside was facing a lot of scrutiny from the State because it was a lower performing school with a lot of behavioral problems. Hillside had not performed as well as other schools in the district, although it was receiving a great deal of attention and support from

the district, including Durham Public Schools bringing in instructors from North Carolina Central University to teach. At the time, Hillside was under state court supervision for mandated improvement. A fraternity brother teaching at Hillside connected me to the principal. I selected 11 mentors from UNC-Chapel Hill, and we began mentoring students one-on-one at a Saturday academy.

17. This program continued to grow, and 10 years later, MOY now works with 1,000 students across four states. We have mentors who are students at UNC-Chapel Hill, Duke University, North Carolina Central University, North Carolina Agricultural and Technical State University (“NC A&T”), Shaw University, Winston Salem State University, Howard University, Hampton University, and Columbia University.

18. MOY prepares diverse youth to lead and succeed in the 21st Century through mentoring and targeted enrichment activities led by college students. MOY exposes students to a number of opportunities, including Leadership Academy, Team Mentoring, College Tours, Summer Enrichment Academy, international travel via the J.U.S.T Global Fellowship, and scholarships through the Tyreic E. Hemphill Memorial Scholarship Fund. Through this dynamic design, participants receive intellectually challenging programming, positive role models to help set long-term aspirations, and the support required to nurture and fulfill those aspirations.

19. At present, MOY impacts hundreds of middle and high school students annually and is in the process of scaling nationally. We focus on students who are in the

middle academically. Since MOY's inception, 99% of participants have been students of color with the following outcomes: (1) 100% of students complete at least eight (8) hours of community service per school year (MOY mentors and mentees have completed 25,000+ volunteer hours since 2006); (2) 100% of high school students enroll in at least one Honors or Advanced Placement Course; (3) 100% of students graduate from high school; and (4) 96.5% of students enroll in college.

20. MOY aspires to be the nation's leading movement for young people to disrupt the status quo and build a safer, smarter, more socially conscious world. Our investment in diverse students today is an investment in America's future. We believe that everyone is born with what it takes to make a difference in this world. To that end, we work to empower youth to discover their unique gifts, helping them achieve and advance towards a successful life.

21. We have had graduates of the MOY program who help us expand. For instance, one of our graduates went to NC A&T and started the program there. We hope to continue to grow the program nationally and serve more underrepresented students.

22. MOY started because of my personal experiences and the opportunities I was given at UNC-Chapel Hill.

### **The Importance of Diversity at UNC-Chapel Hill**

23. Picture the world as a lake, and you see that some of those fish are struggling and dying. You spend day after day trying to help and fix those fish, but they

keep struggling and dying. The question becomes not just what is wrong with those particular fish, but more broadly what is wrong with the lake.

24. From my work and research, I have learned that there is an empathy gap when it comes to race. Negative messages from the media about people of color are impacting the ability of White people to empathize with people of color. This effect is compounded when you understand that 90 percent of the social networks of White people are White. These people may not have regular interactions with people of color.

25. Institutional and structural racism present barriers to people of color. Having mentors and role models who are successful people of color help to break down those barriers and to create opportunities for other people of color.

26. At UNC-Chapel Hill, my interactions with people of different races were mostly positive. However, I did experience some microaggressions, and several times, my fellow students questioned whether I was qualified to be at UNC-Chapel Hill. I worked hard to get into UNC-Chapel Hill and it was difficult for me to have my work questioned for no reason other than my race. It lowered my self-esteem.

27. At UNC-Chapel Hill, I was able to regularly interact with people of different races and different backgrounds. However, when I was a biology major, my classes were not diverse. In several larger classes, I was the only person of color in the room.



28. Regular interaction with people of different races and backgrounds is important for understanding each other. If people do not know how to connect with one another, the opportunity to understand each other may be lost. Diversity and equity is critical. The only way to promote racial healing is through active dialogue and plans for reconciliation. We all need a common space for understanding, even if not always in agreement. I had this opportunity at UNC-Chapel Hill. Maybe not always in classroom, but on campus. That is what college should be about.

### **Conclusion**

23. I will forever be grateful to those who paved the way for me and showed me that I could succeed. Students of color who succeed in higher education can reach back and help others like them so that students from challenging backgrounds can have better lives.

24. College is a place where students can learn from each other and prepare for life. If we do not have the opportunity to meet others who are different in college, we may miss that opportunity. Experiencing equity and diversity helps us all connect, develop empathy for one another, and reconcile the issues that divide us.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: 8/28/17

Atrayus Goode

